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25 WAL-MART ASSOCIATES, INC.

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1 Plaintiff TAMARA GEIST (“Plaintiff”) and Defendant WAL-MART ASSOCIATES, INC.  
2 (“Defendant”), by and through their counsel, hereby stipulate and agree as follows:

3 WHEREAS, the Parties’ deadline to complete fact discovery is August 4, 2025;

4 WHEREAS, Plaintiff conducted a Rule 30(b)(6) deposition on July 23, 2025;

5 WHEREAS, the Parties are continuing to meet and confer on several topics where further  
6 information is requested by Plaintiff;

7 WHEREAS, Defendant has not yet received medical records subpoenaed from Plaintiff’s  
8 healthcare providers and has not had the opportunity to evaluate whether Plaintiff’s healthcare  
9 provider depositions are necessary;

10 WHEREAS, the Parties are making this request as soon as reasonably practicable once the  
11 Parties realized the necessity of the extension based on productive meet and confer efforts regarding  
12 Plaintiff’s request for further information following Defendant’s Rule 30(b)(6) deposition and  
13 Defendant’s need to review Plaintiff’s medical records and potentially depose Plaintiff’s healthcare  
14 provider(s);

15 WHEREAS, both Parties will suffer significant prejudice if the fact discovery deadline is  
16 not extended for the limited purposes outlined above;

17 WHEREAS, the Parties agree that neither Party will suffer any prejudice if the Court  
18 extends the fact discovery deadline for the limited purposes outlined above;

19 WHEREAS, the Parties agree that the interests of justice are best served by *an extension of*  
20 *the fact discovery deadline for the limited purposes of Plaintiff’s request for further information*  
21 *following Defendant’s Rule 30(b)(6) deposition and Defendant’s review of Plaintiff’s medical*  
22 *records and potential deposition(s) of Plaintiff’s healthcare providers;*

23 THEREFORE, for the reasons set forth above, good cause exists for an extension of the  
24 August 4, 2025 fact discovery deadline. Subject to the Court’s approval the Parties stipulate and  
25 agree to the proposed revised deadlines below:

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Event	Current Date	Proposed Date
Fact Discovery Cutoff for the Sole Purpose of meeting and conferring on the Rule 30(b)(6) Deposition of Walmart and Defendant obtaining medical records and potentially deposing Plaintiff's healthcare providers.	August 4, 2025	September 2, 2025

11  
12 **IT IS SO STIPULATED.**

13 DATED: August 4, 2025

14 EXCELSIS LAW, P.C.

15 By: /s/ Zainah Alfi  
16 C. Genevieve Jenkins  
17 Zainah Alfi

18 Attorneys for Plaintiff  
19 TAMARA GEIST

20 DATED: August 4, 2025

21 OGLETREE, DEAKINS, NASH, SMOAK &  
22 STEWART, P.C.

23 By: /s/ Michele J. Bongiovanni  
24 James T. Conley  
25 Michele J. Bongiovanni  
26 Sandra Benlevy

27 Attorneys for Defendant  
28 WAL-MART ASSOCIATES, INC.

1 **SIGNATURE ATTESTATION**

2 I attest that I have obtained concurrence in the filing of this document from the other  
3 signatories in compliance with Local Rule 131(e).

4  
5 Date: August 4, 2025

By: /s/ Michele J. Bongiovanni

6 Michele J. Bongiovanni

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## **ORDER**

The Court having read and considered the Parties' Joint Stipulation to Continue Pretrial Dates, and good cause appearing:

IT IS HEREBY ORDERED that the pretrial dates shall be as follows:

Event	Current Date	Proposed Date
Fact Discovery Cutoff for the Sole Purpose of meeting and conferring on the Rule 30(b)(6) Deposition of Walmart and Defendant obtaining medical records potentially deposing Plaintiff's healthcare providers.	August 4, 2025	September 2, 2025

## IT IS SO ORDERED.

Dated: August 5, 2025

Troy L. Nunley  
Chief United States District Judge